

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

No. 3:14-Cr-293-M
ECF

JOHN WILEY PRICE (01)

DEFENDANT'S WITNESS LIST

WITNESS

SUBJECT MATTER

Those Individuals or Custodians included on the Proponent's (Government's)
Witness List¹

Custodian of Records, Dallas County
Custodian of Records, Dallas County

Dallas County records
Commissioners' Court Recordings

Custodian of Records, [all banks]

Financial institution records

Custodian of Records, [all companies
named in government's indictment]

Company's records

Summary Witness(es)

Summaries responsive to any admitted
summary testimony or evidence,
including financial records

The Following Individuals are Probable Fact Witnesses:

Jim Baugh

Inland Port.
The company did not engage Ms.
Nealy in order to bribe anyone,
including the Defendant, and did not

¹ The Defendant respectfully requests that any person who has been subpoenaed by the government not be released from the subpoena without the concurrence of the Defendants.

bribe anyone.

Michael Berry

Inland Port.

The company did not engage Ms. Nealy in order to bribe anyone, including the Defendant, and did not bribe anyone.

Kathy Blanck

Companies designated in the indictment by letters.

The company did not engage Ms. Nealy in order to bribe anyone, including the Defendant, and did not bribe anyone.

David Brown

Commissioner Price's efforts and performance as a public official.

Shannon Brown

Procurement process, Dallas County; matters raised in indictment, including dealings with Commissioner Price; minority set-aside requirements.

Mike Cantrell

RFPs and RFQs in indictment.

Kate Connolly

Companies designated in indictment by letters.

The company did not engage Ms. Nealy in order to bribe anyone, including the Defendant, and did not bribe anyone.

Allen Clemson

Commissioners Court proceedings and procedures. Dealings with Commissioner Price, with respect to Dallas County business, including procurement.

Robert Clines

Information Technology matters, Dallas County.

Levi Davis

Price's efforts to achieve economic opportunity for minorities, including affirmative action and minority set asides.

Tom Dunning

Defendant's advocacy of economic opportunity for minorities, including affirmative action and minority set asides, including the Dallas historical context. Defendant Price's efforts and performance as a public official in Dallas.

Michael Eric Dyson

Defendant's Price's independence and stature within the African American community. Commissioner Price's efforts, performance, and achievements as a public official and an activist, to gain economic opportunities for minorities, affirmative action and minority set asides in particular. Defendant's flamboyance. The context in which the Defendant and numerous relationships were formed, including his relationship with Kathy Nealy. Ms. Nealy's status in the consulting and lobbying world.

John Edmonds

Conduct of Richard Allen. The Inland Port.

Caryn Fain

Conduct of the Investigation. Assertions in indictment. Defendant Price's performance as a public official.

John Fullinwider

Dallas civil rights history and concomitant necessity to address economic deprivation aggressively.

Defendant Price's efforts on behalf of minority set asides and affirmative action. Reasons for hostility towards Commissioner Price. Defendant Price's independence. Defendant Price's efforts and achievements on behalf of Dallas. Defendant Price's performance as a public official.

Larry Hall

Companies named in indictment by letter.

The company did not engage Ms. Nealy in order to bribe anyone, including the Defendant, and did not bribe anyone.

Vincent Hall

Operation of Office of Commissioner John Wiley Price. Responsibilities of the office and performance of duties within the office. Price's frugality. Price's efforts on behalf of Dallas County. Price's work ethic. Price's independence. Price's performance as a public official. Thoroughness and diligence with which Commissioner Price handles Dallas County matters.

Gwen Heard

Dallas County purchasing procedures. Commissioner Price's thoroughness, diligence and work ethic with respect to the County's business. Commissioner Price's efforts to achieve affirmative action and minority set asides.

Gordon Hikel

Commissioners Court procedures. Dallas County procedures. Dallas County procurement procedures. Commissioner Price's thoroughness, diligence and work ethic with respect

to the business of Dallas County, including procurement.

Vonciel Hill

Mike Rawlings' mayoral campaign. Matters in indictment. Relationship between Kathy Nealy and Defendant Price, its formation, foundation and growth. Ms. Nealy's business, political, and consulting business, including Ms. Nealy's stature and credibility as a consultant and lobbyist. Price's work ethic. Price's commitment and efforts to achieve minority participation in economic benefits conferred by Dallas government, including affirmative action and minority set asides. The Defendant's dedication to achieving cost-efficient results for Dallas County and assuring minority participation in County contracting.

Dr. Zan Holmes

The Defendant's independence. The Defendant's efforts on behalf of Dallas County as a Commissioner and an activist. The Defendant's work ethic. The Defendant's frugility. The manner in which the Defendant operates as a public official and public persona.

Michael Hurtt

Inland Port. His dealings with respect to the Inland Port. Commissioner Price's efforts and achievements on behalf of constituents.

Brenda Jackson

Transactions with the Defendant. Relationship with the Defendant. Price's efforts and dedication on behalf of Dallas County. Price's work ethic.

Jim Jackson	Work with the Defendant during time period covered by the indictment. Defendant's approach to, and manner of handling the County's business. Price's work ethic.
Willis Johnson	Conduct of Richard Allen. The Inland Port. JBJ Marketing. Political consulting, Dallas. Price's frugality. Price's independence. Price's work ethic.
Ron Kirk	Kathy Nealy's reputation as a political and business consultant and lobbyist during the time period covered by the indictment.
Rick Loessberg	Dealings with Commissioner Price and others re Inland Port. Price's commitment to minority contracting.
Gloria McCullough	Dallas County procurement procedures. Defendant Price's approach to County business, including procurement matters.
William Methenitis	Companies designated in indictment by letter. The company did not engage Ms. Nealy in order to bribe Commissioner Price and the company did not bribe Commissioner Price, or anyone else.
Gary Miglicco	Companies designated in indictment by letter. Ms. Nealy was not engaged in order to bribe anyone, including the Defendant, and did not bribe anyone.

Kathy Nealy

As she has told the government since 2007, she **“never paid PRICE for any official actions by him or for any type of benefit from Dallas County”**. Her successful political, lobbying, and business consulting company and the nature of such consultancies. Her acquisition of various properties. Her national and local consulting and lobbying efforts, including with respect to Dallas County. Her relationship with Defendant and how that relationship was forged. The Defendant’s efforts on her behalf with respect to properties she owned. Various purchases the Defendant made for her. Various purchases she made from the Defendant. The nature of her contacts with Defendant Price with respect to any County business. Price’s frugality. Price’s flamboyance and her encouragement of that. Price’s work ethic. Her IRS situation as set forth in one of the two SARs and that the situation has nothing whatsoever to do with Commissioner Price. She engaged in no conspiracy to obstruct the IRS with Commissioner Price or anyone else.

Pettis Norman

Conduct of Richard Allen. The Inland Port. Price’s frugality. Price’s efforts on behalf of Dallas County. Price’s work ethic.

Karen Pettis

Conduct of the Investigation. Price’s frugality. Price’s work ethic. Price’s diligence and thoroughness with respect to the business of Dallas County.

H. Ross Perot, Jr.

Companies named in indictment by letter. His company's work with Kathy Nealy on various projects. His dealings with Ms. Nealy and others. His company did not engage Kathy Nealy to bribe Commissioner Price and did not bribe Commissioner Price or anyone else.

Michael Rader

Foreign Trade Zone. Dealings with Commissioner Price and others.

DeMetris Sampson

Commissioner Price's efforts with respect to minority contracting/set asides. Price's frugality. Price's diligence and efforts on behalf of Dallas County. Price's work ethic. Commissioner Price's efforts, achievements and performance as a public official.

William Sechrest

The bank transactions in indictment. Defendant Price's relationship with the bank.

Don Williams

Defendant Price's dedication to Dallas. Defendant Price's efforts, achievements, and performance as a public official. Commissioner Price's well-known reputation in the community, especially the business community, concerning the need for minority contracting/set asides and affirmative action. Price's work ethic.

Levi Williams

Price's dedication to Dallas. Price's work ethic.

Expert Witness

Chris Dellinges

Expert witness re tax matters previously disclosed. Expert re accusation of 7206(1) violations and accusation of conspiracy to obstruct IRS. Certified Public Accountant treatment of tax issues raised by documentary evidence and testimony; summary witness re material submitted with the Special Agent's Report and assertions therein.

Respectfully submitted,

/s/Shirley Baccus-Lobel

Shirley Baccus-Lobel
Law Office of Shirley Baccus-Lobel
A Professional Corporation
8350 Meadow Road, Suite 186
Dallas, Texas 75231
214.220.8460
214.987.3169 (f)
SBL@LobelLaw.com

/s/Christopher Knox

Christopher Knox
The Knox Firm
900 Jackson Street
Suite 650
Dallas, Texas 75202
214.741.7474
214.747.7711 (f)
chrisknox@knoxcriminaldefense.com

Attorneys for Defendant Price

CERTIFICATE OF SERVICE

I certify that on January 19, 2017 I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. The electronic case files system sent a "Notice of Electronic Filing" to the following individuals who have consented in writing to accept this Notice as service of this document by electronic means: AUSAs Walt Junker, Katherine Miller, and Nick Bunch, 3rd Floor, 1100 Commerce, Dallas, Texas 75242; and all other counsel of record.

/s/Shirley Baccus-Lobel
Shirley Baccus-Lobel